

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

BEEQB, LLC, a Florida corporation,)	Civil Action No. 7:24-cv-03179-TMC
)	
Plaintiff,)	
vs.)	BLOCKQUARRY CORP. f/k/a ISW
)	HOLDINGS, INC.’S LOCAL RULE
BLOCKQUARRY CORP. f/k/a ISW)	26.01 INTERROGATORY RESPONSES
HOLDINGS, INC., a Nevada Corporation,)	
and PANTHEON RESOURCES, INC.,)	
)	
Defendant.)	
)	

Defendant BlockQuarry Corp., f/k/a ISW Holdings, Inc. (“BlockQuarry”) hereby responds to the District of South Carolina Federal Local Rule 26.01 Interrogatories as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: Not applicable.

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff has requested a jury trial in its Complaint. Plaintiff’s final claim for unjust enrichment is an equitable claim and is not triable by a jury. *See Verenes v. Alvanos*, 690 S.E.2d 771, 774 (S.C. 2010) (noting there is no right to a jury trial for equitable claims); *Regions Bank v. Wingard Props., Inc.*, 715 S.E.2d 348, 356 (S.C. Ct. App. 2011) (“Unjust enrichment is an equitable doctrine[.]”).

- (C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: BlockQuarry is a publicly owned company (OTC:BLQC). BlockQuarry does not have a parent corporation, and no publicly owned company owns ten percent or more of BlockQuarry’s stock. BlockQuarry is not a parent company of any publicly owned company,

and does not own ten percent or more of the outstanding shares in any publicly owned company.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: This case is based on events allegedly occurring, in part, in Gaffney, South Carolina, which is part of the Spartanburg Division.

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.¹

ANSWER: This case is related to the same underlying set of facts at issue in *BlockQuarry Corp. f/k/a ISW Holdings, Inc. v. Litchain Corp. and Gaffney Board of Public Works*, Civil Action No. 7:23-cv-01427-TMC (the “Litchain Action”). The facts at issue in both cases concern the same bitcoin mining site in Gaffney, South Carolina and the bitcoin miners that were located on that site. The Litchain Action was dismissed on April 12, 2024, pursuant to Rule 41 of the Federal Rules of Civil Procedure.

- (F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: BlockQuarry has been properly identified.

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

¹ This information is required in addition to completion of the “related cases” block on the JS44 Civil Cover Sheet. Although the Civil Cover Sheet requires only that parties disclose *pending* related cases, this interrogatory and this District’s assignment procedures require disclosure of *any prior or pending* related case whether civil or criminal. Therefore, both categories should be disclosed in response to this interrogatory as well as on the JS 44 Civil Cover Sheet.

ANSWER: In the event there is a finding of liability against BlockQuarry in this matter, BitFive, LLC and its principal, Robert Collazo (collectively, the “BitFive Parties”), are liable to BlockQuarry. The BitFive Parties were responsible for the management of the bitcoin mining site in Gaffney, South Carolina described in this case and are liable to BlockQuarry on that basis.

(H) In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER: The subject matter jurisdiction of this Court is based on diversity jurisdiction under 28 U.S.C. § 1332(a). BlockQuarry is a corporation organized under the laws of Nevada and maintains a principal place of business in Texas.

Respectfully submitted,

MAYNARD NEXSEN PC

s/ Andrew A. Mathias

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Greenville, South Carolina

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